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July 9, 2021

Via ECF

Honorable Judge Ona T. Wang
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: Lisa Jones v. EIB Riverdale Crossing LLC, et al.
Docket No: 1:20-cv-10264-AJN
GS File No.: 1342.0381

Your Honor:

As you know, we represent defendants, EIB Riverdale Crossing LLC ("EIB") and BJ's Wholesale Club, Inc. ("BJ's"), in connection with the above-referenced matter. Please allow this correspondence to serve as the defendants' letter application/motion seeking a 60-day extension of the Court's pending discovery deadlines and adjournment of the upcoming scheduled Status Conference before your Honor on July 20, 2021. Please note that the undersigned reached out to plaintiff's counsel on July 7, 2021 and July 9, 2021 to discuss the below request and is awaiting counsel's response to same.

The parties appeared before your Honor on or about March 16, 2021, at which time your Honor issued a Civil Case Management Plan and Scheduling Order as follows:

- 7/9/21 – Deadline to complete fact discovery;
- 7/20/21 – Status Conference scheduled with Court; and,
- 8/27/21 – Deadline to complete expert discovery.

Since the Initial Conference, the parties have exchanged initial written discovery, processed authorizations for the release of plaintiff's post-accident medical records and engaged in preliminary settlement negotiations. While the parties intend to continue settlement negotiations in good faith, the parties have conferred and agreed with your Honor's approval to conduct plaintiff's deposition on 8/13/21 and defendant's deposition on 8/25/21.

In light of the above, please allow this correspondence to serve as BJ's first request that your Honor issue an Order extending the Court's discovery deadlines and adjourning the upcoming scheduled Status Conference by 60-days as follows:

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Honorable Judge Ona T. Wang
United States District Court
Southern District of New York
July 9, 2021
Page 2 of 2

- 9/9/21 – Deadline to complete fact discovery;
- ~~9/20/21 – Status Conference scheduled with Court, and,~~ NO
- 10/27/21 – Deadline to complete expert discovery.

Thank you for allowing the parties to address the Court.

Very truly yours,

GOLDBERG SEGALLA LLP

J. Daniel Velez
J. Daniel Velez, Esq.

JDV/nr

Via ECF

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The Court has back-to-back trials scheduled in September. Parties to meet and confer and propose three dates for an in-person status conference during the weeks of Oct. 4 & Oct. 12. Conf. of 7/20/21 adjourned sine die. So ordered. 7/19/21

